



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

October 19, 2017

CERTIFIED MAIL NO. 7003 2260 0005 8732 0300

Tom Pullet, District Manager
Kelly Run Sanitation, Inc.
1500 Hayden Boulevard
Elizabeth, PA 15037

Re: Administrative Incompleteness Review Letter
Class 1 Post-closure Permit Modification
Kelly Run Sanitation, Inc. Western Disposal Area
Forward Township
Allegheny County
I.D. No. PAD004810222
APS. ID No. 17636
Authorization No. 1200299



Dear Mr. Pullet:

The Department of Environmental Protection (DEP) has determined that the above referenced application for a replacement leachate conveyance line, received from Civil Design Solutions, Inc. on behalf of Kelly Run Sanitation, Inc. (KRS) on August 22, 2017, is administratively incomplete. The following list specifies items which must be included in the resubmittal of your application and/or the submission of additional information in accordance with 25 Pa. Code Section 270a.10(c)(3).

Items for Resubmittal or Submission of Additional Information

1. RCRA HW Part A Form (EPA 8700-12, 8700-13 A/B, 8700-23): The signature page, which is part of the Site Identification Form (EPA 8700-12), as well as the Site Identification Form are missing. Also, mail a copy of the Site Identification Form addressed to:

Pennsylvania Department of Environmental Protection
Bureau of Waste Management
Division of Hazardous Waste Management
P.O. Box 69170
Harrisburg, PA 17106-9170

2. Page 5 of the Project Narrative, regarding Western Disposal Area (WDA) Leachate Conveyance Line Maintenance and Sludge Management: One of the measures proposed involves opening and checking cleanouts if the flowmeters at the end of the replacement leachate conveyance line show a decrease to the flows from the WDA greater than 33% as compared to the same month in the previous year and there are no other reasons a reduction would be expected (i.e. pumping reduced). Kindly, provide the basis and suitable references supporting the proposed measures (e.g., pertinent current code(s) of practice developed by Nationally recognized associations, etc.).
3. The application does not demonstrate that a notice of the proposed permit modification has been sent to all persons on the facility mailing list as per 40 CFR Section 270.42(a), incorporated by reference at 25 Pa Code Section 270a.1, as modified at 25 Pa Code Section 270a.42.

Your response should be in the form of revisions to affected pages, forms or drawings in the application. Each revision or addition should bear the revision date and show what items have been revised or added. DEP suggests you use colored paper for page revisions to the application with highlighted additions and strikethrough deletions so changes are easily identified. All revised forms must have the title sheet marked with the latest revision date. Please provide an original and two (2) copies of the revisions with instructions for inserting changes.

Please note that this information must be received within 90 days or DEP may deny the application. This application is not eligible for Permit Decision Guarantee or Permit Prioritization per the Department's "Policy for implementing DEP's Permit Review Process and Permit Decision Guarantee" – Document Number 021-2100-001.

If you have questions regarding the identified items, please contact Oscar Vazquez at 412.442.4157, and refer to I.D. No. PAD004810222, Authorization No. 1200299 to discuss your concerns.

Sincerely,



Oscar C. Vazquez, P.E.
Environmental Engineer
Bureau of Waste Management

cc: Allegheny County
Forward Township
Sara Kinslow - U.S. EPA Region III
David Murray – Civil Design Solutions, Inc.
Regional
Chron
Central Office – Hazardous Waste Division
O. Vazquez



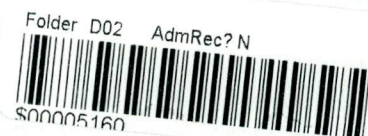
pennsylvania

DEPARTMENT OF ENVIRONMENTAL
PROTECTION

April 2, 2018

Tom Pullet, District Manager
Kelly Run Sanitation, Inc.
1500 Hayden Boulevard
Elizabeth, PA 15037

Re: Completeness Review Letter
Class 1 Post-closure Permit Modification
Kelly Run Sanitation, Inc. Western Disposal Area
Forward Township
Allegheny County
I.D. No. PAD004810222
APS. ID No. 17636
Authorization No. 1200299




Dear Mr. Pullet:

The Department of Environmental Protection (DEP) has reviewed for completeness the above referenced application received from Civil Design Solutions on behalf of Kelly Run Sanitation, Inc., on August 22, 2017, as modified by subsequent revisions received on January 18, 2018. The Department has determined that the application package contains sufficient detail to enable DEP to conduct the technical review, and has been accepted for that purpose.

This is not a final action by the Department on this application. The completeness review is the first step in a series of reviews conducted by DEP. The application will now move to the technical review stage of the permit review process. To follow your application through the review process, please visit *eFACTS on the Web* at: <http://www.ahs2.dep.state.pa.us/eFactsWeb/default.aspx>.

I trust that you find this information helpful in understanding the permit review process. If you have additional questions about your application, please contact me at the telephone number 412.442.4157 and refer to Application No. PAD004810222, Authorization No. 1200299.

Sincerely,


Oscar C. Vazquez, P.E.
Environmental Engineer
Bureau of Waste Management

cc: Allegheny County
Sara Kinslow – U.S. EPA Region III
Civil Design Solutions, Inc.
Chron
O. Vazquez

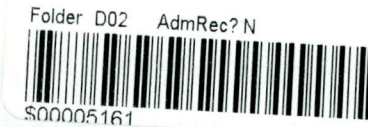
Forward Township
David W. Murray, P.E. –
Regional
Central Office – Hazardous Waste Division



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

April 10, 2018

CERTIFIED MAIL NO. 7015 1520 0001 3088 8391



Tom Pullet, District Manager
Kelly Run Sanitation, Inc.
1500 Hayden Boulevard
Elizabeth, PA 15037

Re: Technical Review Letter
Class 1 Post-closure Permit Modification
Kelly Run Sanitation, Inc. Western Disposal Area
Forward Township
Allegheny County
I.D. No. PAD004810222
APS. ID No. 17636
Authorization No. 1200299

Dear Mr. Pullet:

The Department of Environmental Protection (DEP or the Department) has reviewed the above referenced application received on August 22, 2017 as modified by an amendment received on January 18, 2018, and deemed administratively complete on April 2, 2018. The Department has identified the following technical deficiencies. The deficiencies are based on applicable laws and regulations, and any guidance referenced below sets forth the Department's preferred means of satisfying the applicable regulatory requirements.

Technical Deficiencies

1. RCRA Hazardous Waste (HW) Part A Form: The application reports no changes to the types of waste that were disposed at the closed Western Disposal Area (WDA) landfill. However, the list of hazardous waste codes (HWCs) provided seems to be different from the list of HWCs reported in former RCRA HW Part A Form submissions. Namely:
 - A. HW Permit Part A Form – Section 7 (Description of Hazardous Wastes): The list of EPA HW Nos. provided appears to be incomplete.
 - B. RCRA Subtitle C Site Identification Form – Section 10.B (Waste Codes for Federally Regulated Hazardous Wastes): The list of HWCs outlined: K054, D002, and D001, appears to be incomplete. Also, further note that HWC K054 appears to be erroneous.

2. Project Narrative:

A. WDA Leachate Conveyance Interim Measures Section: This section describes the interim measures implemented to allow for conveyance of leachate from the WDA and indicates that Manhole No. 2, which was part of the older leachate conveyance system, has been decommissioned. Provide a certification by a qualified Pennsylvania registered professional engineer addressing decommissioning of Manhole No. 2.

B. WDA Leachate Conveyance Final Replacement Line Design Section:

- i. This section indicates that the underground replacement leachate conveyance line will be installed in a trench to protect the piping and provide frost protection. The proposed secondary containment for the replacement leachate conveyance line seems to not provide with a leak detection system capable of detecting leaks from the carrier line.
- ii. The Section indicates that the eastern portion of the proposed replacement leachate conveyance line will cross the bottom of the closed Phase I landfill area, as shown in Drawing No. (2017-105)-01, prior to connecting the line to the existing on-site leachate valving/flowmeter building. Similarly, Drawing No. (2017-105)-05 shows that the western portion of the proposed replacement leachate conveyance line will cross a portion of the closed WDA. The application lacks satisfactory information regarding proposed construction measures/procedures to be followed/implemented to ensure that the integrity and effectiveness of both the Phase I and the WDA synthetic cap systems will be maintained during and following the installation of the replacement leachate conveyance line. Please, describe the construction activities and quality control/assurance measures to be adopted, particularly within the closed WDA and Phase I synthetic cap system footprints, during the installation of the replacement leachate conveyance line and how these construction practices will be adequate and consistent with the approved closure, CQC and CQA plans for these areas.

Also, note that a separate authorization under Municipal Waste Permit I.D. No. 100663 for the underground installation of the leachate conveyance pipe, that will cross a portion of the closed Phase I waste cell, will need to be obtained as part of this project.

- iii. This section does not satisfactorily include an inspection and monitoring program with adequate inspection and monitoring frequencies, to be undertaken at the closed WDA and Phase I disposal areas to ensure that the integrity and the effectiveness of the respective cap systems are not compromised following construction of the leachate conveyance line, and continue to function as designed. The inspection and monitoring tasks should address at least slope stability, soil cover and vegetation, surface water management features, and erosion in surrounding features.

C. Leachate WDA Leachate Conveyance Line Maintenance and Sludge Management Section: This section also describes the installation of a new solids collection HDPE manhole, shown in

Drawing No. (2017-105)-05, nearby Manhole 2. However, the proposed HDPE manhole does not satisfactorily meet secondary containment requirements.

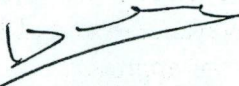
3. The application includes copies of notification letters sent to contiguous landowners, Allegheny County, Elizabeth Township, and Forward Township. Provide proof of the notice in the form of a USPS postmarked signature card or other dated acknowledgement form of private letter carrier services.

You must submit a response fully addressing each of the significant technical deficiencies set forth above within 60 days or DEP may deny the application.

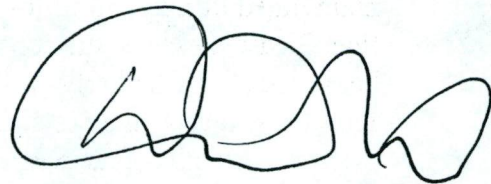
Your response should be in the form of revisions to affected pages, forms or drawings in the application. Each revision or addition should bear the revision date and show what items have been revised or added. DEP suggests you use colored paper for page revisions to the application with highlighted additions and strikethrough deletions so changes are easily identified. All revised forms must have the title sheet marked with the latest revision date. A revised Page 6 of RCRA Hazardous Waste Part A Form must be re-signed by the applicant and marked with the revision date. Please provide an original and two (2) copies of the revisions with instructions for inserting changes.

Should you have any questions regarding the identified deficiencies, please contact Oscar Vazquez at 412.442.4157, and refer to I.D. No. PAD004810222, Authorization No. 1200299 to discuss your concerns. You may also follow your application through the review process via eFACTS on the Web at: <http://www.ahs2.dep.state.pa.us/eFactsWeb/default.aspx>.

Sincerely,

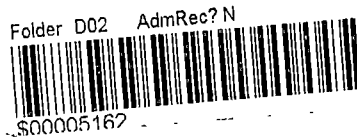


Oscar Vazquez, P.E.
Environmental Engineer
Bureau of Waste Management



Diane D. McDaniel, P.E.
Environmental Engineering Manager
Bureau of Waste Management

cc: Allegheny County
Forward Township
Sara Kinslow – US. EPA Region III
David W. Murray, P.E. – Civil Design Solutions, Inc.
Regional
Chron
Central Office – Hazardous Waste Division
O. Vazquez
J. Garasich



September 12, 2018

CERTIFIED MAIL NO. 7003 2260 0005 8732 0591

Tom Pullet, District Manager
Kelly Run Sanitation, Inc.
1500 Hayden Boulevard
Elizabeth, PA 15037

Re: Elevated Technical Review Letter
Class 1 Post-closure Permit Modification
Kelly Run Sanitation, Inc. Western Disposal Area
Forward Township
Allegheny County
I.D. No. PAD004810222
APS. ID No. 17636
Authorization No. 1200299

Dear Mr. Pullet:

The Department of Environmental Protection (DEP or the Department) received on June 12, 2018 a response to DEP's April 10, 2018 technical deficiency letter regarding the above referenced application. The Department has completed a review of this response and identified the following remaining deficiencies. The deficiencies are based on applicable laws and regulations, and any guidance referenced below sets forth the Department's preferred means of satisfying the applicable regulatory requirements.

Technical Deficiencies

1. Project Narrative:

A. WDA Leachate Conveyance Interim Measures Section: The application now discloses that decommissioning of Manhole No. 2 did not take place during the interim measures implemented to allow for conveyance of the leachate. It should be noted that decommissioning of Manhole No. 2 during implementation of the mentioned interim measures was strongly advised and requested by DEP to ensure that no discharge of leachate from Manhole 2 would continue taking place. To date, KRS has not clearly evidenced that discharge of leachate from Manhole No. 2 is being effectively prevented. Along these lines, the application does not include suitable details of Existing Manhole Nos. 1 and 2 evidencing that the interim measures implemented to temporarily allow for the conveyance of leachate are also effectively preventing conveyance of any leachate through the old piping (e.g., piping under the access road, etc.) to Manhole No. 2, that would result in discharge of leachate from Manhole No. 2.

B. WDA Leachate Conveyance Final Replacement Line Design Section:

- i. Again, note that a separate authorization under Municipal Waste Permit I.D. No. 100663 for the underground installation of the leachate conveyance pipe, that will cross a portion of the closed Phase I waste cell, will need to be obtained as part of this project.
- ii. The application still does not include an inspection and monitoring program to ensure that integrity and effectiveness of the cap systems are not compromised following final installation of the underground leachate conveyance line, and continue to function as designed.


C. Leachate WDA Leachate Conveyance Line Maintenance and Sludge Management Section: The proposed HDPE manhole still does not satisfactorily meet secondary containment requirements.

You must submit a response fully addressing each of the significant technical deficiencies set forth above within 30 days or DEP may deny the application.

Your response should be in the form of revisions to affected pages, forms or drawings in the application. Each revision or addition should bear the revision date and show what items have been revised or added. DEP suggests you use colored paper for page revisions to the application with highlighted additions and strikethrough deletions so changes are easily identified. All revised forms must have the title sheet marked with the latest revision date. A revised Page 6 of RCRA Hazardous Waste Part A Form must be re-signed by the applicant and marked with the revision date. Please provide an original and two (2) copies of the revisions with instructions for inserting changes.

Should you have any questions regarding the identified deficiencies, please contact Oscar Vazquez at 412.442.4157, and refer to I.D. No. PAD004810222, Authorization No. 1200299 to discuss your concerns. You may also follow your application through the review process via eFACTS on the Web at: <http://www.ahs2.dep.state.pa.us/eFactsWeb/default.aspx>.

Sincerely,



Oscar Vazquez, P.E.
Environmental Engineer
Bureau of Waste Management



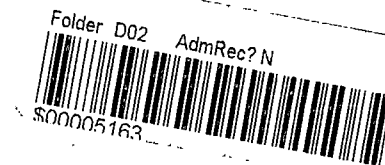
Diane D. McDaniel, P.E.
Environmental Engineering Manager
Bureau of Waste Management

cc: Allegheny County
Forward Township
Sara Kinslow – US. EPA Region III
David W. Murray, P.E. – Civil Design Solutions, Inc.
Regional
Chron
Central Office – Hazardous Waste Division
O. Vazquez

November 19, 2018

CERTIFIED MAIL NO. 7018 1130 0001 4475 5151

Tom Pullet, District Manager
Kelly Run Sanitation, Inc.
1500 Hayden Boulevard
Elizabeth, PA 15037



Re: Class 1 Permit Modification
Kelly Run Sanitation, Inc. Western Disposal Area
Forward Township
Allegheny County
I.D. No. PAD004810222
APS No. 17636
Authorization No. 1200299

Dear Mr. Pullet:

Enclosed is a Class 1 permit modification of Solid Waste Permit No. PAD004810222 for the post-closure care of the Kelly Run Sanitation, Inc. (KRS) Western Disposal Area (WDA), issued in accordance with Article V of the Solid Waste Management Act, 35 P.S. Sections 6018.101, et seq. This Class 1 permit modification approves the final installation of a replacement leachate conveyance line for the WDA with the following conditions (Enclosed are affected pages Nos 2, 10-a, 10-b, 11-a, and 11-b with the modified conditions, as noted in red italics, of the permit):

1. The following drawings are approved in support of this permit modification:

<u>Supplied Drawing No.</u>	<u>Title/Description</u>	<u>Date (Revision)</u>
(2017-105)-01	Leachate Conveyance Piping Site Plan	07/30/17
(2017-105)-02	Conveyance Pipe Site Plan	07/30/17
(2017-105)-03	Valve Building Existing Layout	08/18/17
(2017-105)-04	Valve Building Proposed Layout	06/2018
(2017-105)-05	Conveyance Line Details	10/2018
(2017-105)-06	Valve Building Elevations	7/30/17
(2017-105)-07	Valve Building Details	07/30/17

2. A separate approval under Permit I.D. No. 100663 for the trenched installation of the leachate conveyance pipe across the portion of the closed Phase 1 municipal waste cell within the final cover, as shown in approved drawing Nos. (2017-105)-01 and (2017-105)-05, and the changes proposed at the valve building as shown in approved drawing No. (2017-105)-04, shall be obtained prior to initiating the activities authorized under this Class 1 permit modification.

3. Notwithstanding the requirements under Permit Condition III.B.3, existing Manhole No. 2 shall be decommissioned within 60 days of the date of issuance of this permit modification and certified as required under Permit Condition No. III.B.6.
4. The replacement leachate conveyance piping system shall be tested for tightness/integrity in accordance with a current code of practice developed by a Nationally recognized association and in accordance with the manufacturer's instructions, prior to being placed into service. The tightness tests results shall be included and addressed in the certification required under Permit Condition No. III.B.6.
5. The Permittee shall submit a certification by a qualified Pennsylvania registered professional engineer of forms provided by the Department upon completion of the replacement leachate conveyance system shown in approved Drawing Nos. (2017-105)-01 and (2017-105)-05. The certification shall address the decommissioning of Manhole No. 2, which was a component of the older leachate conveyance system, and describe the construction activities being certified using testing results, drawings, and plans as appropriate and in accordance with the pertinent closure plans approved by DEP. The certification shall state that the actual construction activities were observed by the engineer or persons under his/her direct supervision, and that the supervision was carried out in a manner consistent with the approved permits.
6. Should the WDA leachate discharge to the POTW described in Permit Condition III.B.1 becomes temporarily unavailable, then the Permittee may opt for interim storage of WDA leachate in tanks, as described in the approved application, contingent upon compliance with the "90-day" accumulation rule under 40 CFR Part 262, incorporated by reference at 25 Pa. Code Chapter 262a.
7. The Permittee shall implement the inspection and monitoring program described in the application for the replacement leachate conveyance system and as follows:

Weekly inspections and monitoring of the closed WDA and Phase I MW disposal areas shall be conducted for at least 1 year following the conveyance line final certification, to ensure that the integrity and the effectiveness of the cap systems are not compromised following construction of the leachate conveyance line, and continue to function as designed. The focus of the inspection and monitoring tasks shall be at least on slope stability, soil cover and vegetation, surface water management features, and erosion in surrounding features. A written report of the inspection and monitoring findings, including recommendations for corrective actions deemed necessary to ensure continued integrity and effectiveness of the cap systems, shall be maintained as part of the operating record and be accessible for DEP inspection. The Permittee shall verbally notify the Department within 24 hours of discovery of any occurrence or event which may affect the integrity or effectiveness of the cap systems. In addition, written documentation describing such occurrences/events, the actions carried out to correct them, and a strategy for preventing future occurrences shall be provided to DEP within 15 days following any such occurrence.

8. The Permittee shall submit quarterly reports to the Department for at least two years, with a summary of all the inspection and monitoring tasks required in Permit Condition No. III.B.8. After at least 8 quarters of progressive inspection and monitoring in which no impacts to the cap system have been observed, the Permittee may request (with supporting documentation), Department approval to cease submission of the reports.

It was noted during the review of the subject Class 1 minor modification application that the interim leachate conveyance measures implemented by KRS unsatisfactorily deviated from those requested by DEP to ensure that discharge of leachate from Manhole No. 2 under the Phase I/II landfill areas would be effectively prevented. If the Department determines that a notice of violation or an enforcement action involving this issue is appropriate you will be notified under a separate cover.

This authorization does not relieve the applicant from applying for and obtaining any additional permits or approvals from local, state or federal agencies required for this project. Please be advised that if any other permits are required for this project, they must be issued prior to undertaking the activities described in the permit application. Issuance of the enclosed permit(s) does not indicate an affirmative action on any other pending or future permit applications. If you are uncertain as to whether or not other permits are needed for this project, please use the Department's "Permit Application Consultation Tool" (PACT) which can be found at <http://www.ahs.dep.pa.gov/PACT/>. The online tool is designed to quickly and easily assist potential applicants in determining which types of environmental permits, authorizations or notifications would be needed for specific projects. Based on the user's responses to a series of simple questions, PACT automatically provides an email response with information on permits and other information an applicant should consider.

Compliance with the terms and conditions set forth in the permit is mandatory. You have the right to file an appeal as to the modified terms and conditions.

Any person aggrieved by this action may appeal the action to the Environmental Hearing Board (Board) pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. § 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A. The Board's address is:

Environmental Hearing Board
Rachel Carson State Office Building, Second Floor
400 Market Street
P.O. Box 8457
Harrisburg, PA 17105-8457

TDD users may contact the Environmental Hearing Board through the Pennsylvania Relay Service, 800-654-5984.

Appeals must be filed with the Board within 30 days of receipt of notice of this action unless the appropriate statute provides a different time. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

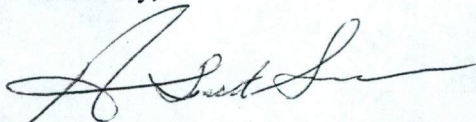
A Notice of Appeal form and the Board's rules of practice and procedure may be obtained online at <http://ehb.courtapps.com> or by contacting the Secretary to the Board at 717-787-3483. The Notice of Appeal form and the Board's rules are also available in braille and on audiotape from the Secretary to the Board.

IMPORTANT LEGAL RIGHTS ARE AT STAKE. YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD AT 717-787-3483 FOR MORE INFORMATION. YOU DO NOT NEED A LAWYER TO FILE A NOTICE OF APPEAL WITH THE BOARD.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST BE FILED WITH AND RECEIVED BY THE BOARD WITHIN 30 DAYS OF RECEIPT OF NOTICE OF THIS ACTION.

If you have any questions about the enclosed permit or requirements of the Solid Waste Management Act, please contact Oscar Vazquez at 412.442.4157 or by email at ovazquez-m@pa.gov.

Sincerely,



H. Scott Swarm
Environmental Program Manager
Bureau of Waste Management

Enclosures: Revised Pages 2, 10-a, 10-b, 11-a, and 11-b of the Permit

cc: Allegheny County Health Department (w/ enclosures)
Forward Township (w/ enclosures)
Sara Kinslow - EPA Region III (w/ enclosures)
David Murray, P.E. – Civil Design Solutions, Inc.
Regional (w/ enclosures)
Chron (w/ enclosures)
Central – Hazardous Waste Division (w/ enclosures)
Permit Binder File (w/enclosures)
O. Vazquez (w/ enclosures)
M. Cwiklik (w/enclosures)
J. Garasich (w/enclosures)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
PERMIT
FOR
HAZARDOUS WASTE FACILITY POST-CLOSURE

Permittee: Kelly Run Sanitation, Inc.

Permit Number: PAD004810222

Facility: Kelly Run Sanitation, Inc. Western Disposal Area, 1500 Hayden Boulevard, Elizabeth, PA 15037

This permit is issued by the Commonwealth of Pennsylvania, Department of Environmental Protection (the Department or DEP) under authority of the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, Act 97, 35 P.S. §§ 6018.101, *et seq.* (the Act) and the Department's hazardous waste regulations to Kelly Run Sanitation, Inc. (hereafter called the Permittee), to perform post-closure monitoring and care at the hazardous waste management facility located in Forward Township, Allegheny County, PA at latitude 40°15'02" North and longitude 79°52'49" West.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (Parts I-IV, consisting of pages 1 through 18 and Attachments 1 through 3) and the applicable regulations contained in 25 Pa. Code Chapters 260a-270a as specified in the permit.

This post-closure permit is based on the assumption that the information submitted in the post-closure permit application attached to the Permittee representative's letter dated April 13, 2016 as modified by subsequent amendments dated July 25, 2016, and October 16, 2017, *and the Class 1 minor modification application dated August 18, 2017 as amended on January 16, June 11, and October 19, 2018* (hereafter referred to as the Application) is accurate and that the facility will be monitored and maintained as specified in the Application. Any inaccuracies found in this information may be grounds for the revocation or modification of this permit and potential enforcement action. The Permittee must inform DEP of any deviation from or changes in the information in the Application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This post-closure permit is conditioned upon full compliance with all applicable provisions of the Act; DEP regulations contained in 25 Pa. Code Chapters 260a-270a; the Clean Streams Law, 35 P.S. §§ 691.1, *et seq.*; the Air Pollution Control Act, 35 P.S. §§ 4001, *et seq.*; the Dam Safety and Encroachments Act, 32 P.S. §§ 693.1, *et seq.*; the Surface Mining Conservation and Reclamation Act, 52 P.S. §§ 1396.1, *et seq.*; the Coal Refuse Disposal Control Act, 52 P.S. §§ 30.51, *et seq.*; all other Pennsylvania statutes related to the protection of the environment; and all Pennsylvania statutes related to the protection of public health, safety, and welfare. Violation of any of these laws and regulations is ground for enforcement action including but not limited to permit revocation.

Where reference is made herein to specific regulatory or statutory sections, such references shall be to the applicable regulatory or statutory sections as amended either in content or citation.

This post-closure permit is effective as of *November 19, 2018*, and shall remain in effect until March 23, 2028 unless modified, terminated or revoked in accordance with 25 Pa. Code §§ 270.41, 270a.42, and 270a.43, or continued.

PART II-GENERAL FACILITY CONDITIONS

In addition, the Permittee shall record a notation on the deed to the facility property - or on some other instrument which is normally examined during title search - that will in perpetuity notify a potential purchaser of the property that the land has been used to manage hazardous waste; its use is restricted; and the survey plat and record of the type, location, and quantity of hazardous waste disposed of within each cell or area of the facility in accordance with 40 CFR § 264.119(b).

40 CFR §§ 264.119(a) and (b) are incorporated by reference at 25 Pa. Code Chapter 264a.

L. MINERAL RIGHTS

Mineral rights owned by the Permittee for the areas covered by this permit shall not be severed for the entire duration of the closure and post-closure period.

M. APPROVED DRAWINGS

The following drawings are approved as part of this permit. The Permittee shall submit to the Department two copies of any new or revised drawings, unless otherwise specified.

<u>Supplied Drawing No.</u>	<u>Title/Description</u>	<u>Date (Revision)</u>
(2016-067)-03	Site Summary	10/2017
(2017-067)-04	Existing Contours & Gas As-Built	10/11/17
Figure 2	Topographic Map Existing Conditions	01/21/03
8140-02-E28	Property Deed Map	12/12/90
8140-CC-E20	As-Built Cap Panel Locations	09/29/93
8140-CC-E22	As-Built Seep Intercept/Transport System	09/29/93
8140-CC-E21	As-Built Cap Drainage Net	09/18/93
8140-CC-M3	Soil Cover Thickness Plan	07/14/93
8140-CC-E28	As-Built Bench Drains of Cap Drainage System	09/27/94
Sheet 1 of 5	Gas Piping Plan	07/25/91
Sheet 2 of 5	Gas System Piping Schematic	07/25/91
Sheet 3 of 5	Gas System Piping Sections/Details	7/25/91
Sheet 4 of 5	Gas System Details	7/25/91
Sheet 5 of 5	Flare Plan and Elevation	7/25/91
Figure 2	Benwood Limestone Potentiometric Map	05/11/16
Figure 3	Connellsville/Clarksburg Member Potentiometric Map	05/11/16
Figure 4	Site-Wide Monitoring Network	10/12/17
Figure 2	Generalized Cross Section	12/13/00
98-005-E3RD	Sewer Profiles	07/26/98
98-005-E4RD	Leachate Sewer Connection Details (Sheet 1 of 2)	07/31/98
98-005-E5RD	Leachate Sewer Connection Details (Sheet 2 of 2)	07/26/98
Figure 1	Leachate Well Location Map	07/21/16
Sheet 2	Drainage Schematic	07/18/02
8140-02-E1	Geologic Cross-Section A-A'	12/13/90
8140-02-E2	Geologic Cross-Section B-B'	12/13/90
8140-02-E24	Hazardous Waste Location Plan	12/13/90

PART II-GENERAL FACILITY CONDITIONS

<u>Supplied Drawing No.</u>	<u>Title/Description</u>	<u>Date (Revision)</u>
(2017-105)-01	Leachate Conveyance Piping Site Plan	07/30/17
(2017-105)-02	Conveyance Pipe Site Plan	07/30/17
(2017-105)-03	Valve Building Existing Layout	08/18/17
(2017-105)-04	Valve Building Proposed Layout	06/2018
(2017-105)-05	Conveyance Line Details	10/2018
(2017-105)-06	Valve Building Elevations	7/30/17
(2017-105)-07	Valve Building Details	07/30/17

PART III-LANDFILLS

A. POST-CLOSURE REQUIREMENTS

The Permittee shall follow the specifications for post-closure monitoring set forth in Attachments 1 and 3, as required by 40 CFR § 264.310(b), incorporated by reference at 25 Pa. Code Chapter 264a and as required below:

1. The Permittee shall maintain the cap and cover system in a manner such that its outer perimeter is well protected and well marked through the post-closure period. The cap and cover system and final grades shall be maintained as specified in Attachment 1. Vegetation on the final cover shall be kept at a height that permits easy and unhindered inspection of the cover.
2. The Permittee shall maintain and monitor the leachate collection and detection system as described in Attachment 1 and 40 CFR § 264.310(b)(2) incorporated by reference at 25 Pa. Code Chapter 264a. The Permittee shall continue submitting leachate management reports, including leachate monitoring results, for the Western Disposal Area and Old Waste Area on a quarterly basis, unless otherwise advised by the Department.
3. The Permittee shall prevent surface water run-on and run-off from eroding or otherwise damaging the final cover and manage run-on and run-off as required by 40 CFR §§ 264.302(g) - (i) and 264.310(b)(5), incorporated by reference at 25 Pa. Code Chapter 264a.
4. The Permittee shall survey the final cover annually as specified in Attachment 1. Survey benchmarks shall be maintained and protected as required by 40 CFR § 264.310(b)(6), incorporated by reference at 25 Pa. Code Chapter 264a.

B. LEACHATE MANAGEMENT

1. The Permittee may continue to discharge leachate to the Elizabeth Borough Municipal Authority treatment plant in accordance with Attachment 1 and the approved plans.
2. The Permittee shall sample and analyze the leachate on at least an annual basis. The Permittee shall submit an annual report by January 31 of each year on the affects of leachate removal from the Western Disposal Area and Old Waste Area, including volumes of leachate removed the previous year, leachate elevations in both landfills and leachate extraction well conditions and repairs.
3. *A separate approval under Permit I.D. No. 100663 for the trenched installation of the leachate conveyance pipe across the portion of the closed Phase 1 municipal waste cell within the final cover, as shown in approved drawing Nos. (2017-105)-01 and (2017-105)-05, and the changes proposed at the valve building as shown in approved drawing No. (2017-105)-04, shall be obtained prior to initiating the activities authorized under this Class 1 permit modification.*
4. *Notwithstanding the requirements under Permit Condition III.B.3, existing Manhole No. 2 shall be decommissioned within 60 days of the date of issuance of this permit modification and certified as required under Permit Condition No. III.B.6.*
5. *The replacement leachate conveyance piping system shall be tested for tightness/integrity in accordance with a current code of practice developed by a Nationally recognized association and in accordance with the manufacturer's instructions, prior to being placed into service. The tightness tests results shall be included and addressed in the certification required under Permit Condition No. III.B.6.*

PART III-LANDFILLS

6. *The Permittee shall submit a certification by a qualified Pennsylvania registered professional engineer of forms provided by the Department upon completion of the replacement leachate conveyance system shown in approved Drawing Nos. (2017-105)-01 and (2017-105)-05. The certification shall address the decommissioning of Manhole No. 2, which was a component of the older leachate conveyance system, and describe the construction activities being certified using testing results, drawings, and plans as appropriate and in accordance with the pertinent closure plans approved by DEP. The certification shall state that the actual construction activities were observed by the engineer or persons under his/her direct supervision, and that the supervision was carried out in a manner consistent with the approved permits.*
7. *Should the WDA leachate discharge to the POTW described in Permit Condition III.B.1 becomes temporarily unavailable, then the Permittee may opt for interim storage of WDA leachate in tanks, as described in the approved application, contingent upon compliance with the "90-day" accumulation rule under 40 CFR Part 262, incorporated by reference at 25 Pa. Code Chapter 262a.*
8. *The Permittee shall implement the inspection and monitoring program described in the application for the replacement leachate conveyance system and as follows: Weekly inspections and monitoring of the closed WDA and Phase I MW disposal areas shall be conducted for at least 1 year following the conveyance line final certification, to ensure that the integrity and the effectiveness of the cap systems are not compromised following construction of the leachate conveyance line, and continue to function as designed. The focus of the inspection and monitoring tasks shall be at least on slope stability, soil cover and vegetation, surface water management features, and erosion in surrounding features. A written report of the inspection and monitoring findings, including recommendations for corrective actions deemed necessary to ensure continued integrity and effectiveness of the cap systems, shall be maintained as part of the operating record and be accessible for DEP inspection. The Permittee shall verbally notify the Department within 24 hours of discovery of any occurrence or event which may affect the integrity or effectiveness of the cap systems. In addition, written documentation describing such occurrences/events, the actions carried out to correct them, and a strategy for preventing future occurrences shall be provided to DEP within 15 days following any such occurrence.*
9. *The Permittee shall submit quarterly reports to the Department for at least two years, with a summary of all the inspection and monitoring tasks required in Permit Condition No. III.B.8. After at least 8 quarters of progressive inspection and monitoring in which no impacts to the cap system have been observed, the Permittee may request (with supporting documentation), Department approval to cease submission of the reports.*

C. GAS MONITORING AND COLLECTION SYSTEM

1. The Permittee shall design, construct, operate and maintain a gas monitoring and collection system, as specified herein and Attachment 1. Horizontal gas collection pipe connections to gas transmission pipes shall be fitted with telescoping connections that provide for landfill settlement protection. The Permittee shall monitor the gas probes and leachate manhole 1 on a quarterly basis in accordance with its Title V permit, incorporated by reference into this post-closure permit, unless otherwise advised by the Department.
2. A hard copy of the gas monitoring results shall be submitted to the Department on a quarterly basis, unless otherwise advised by the Department.
3. Gas monitoring shall be performed for the following probes: 101, 108BR 109A, 124 through 134, 120A through 122A, and 152 through 172. Gas shall be extracted on a continual basis from Western Disposal Area landfill wells W-1 through 9, 11, 14 through 17, 20, 22, 23, 26, 121 through 123 and the horizontal gas collector lines (with monitoring at horizontal collector connection points H-1, 3, 5, 7, 9, 12 through 14, in addition to wells 1 through 3 along the western perimeter of the landfill. These wells, probes and the extracted gas shall be sampled and tested in accordance with the Permittee's Title V permit. The elevation of all gas monitoring and collection wells/access